

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

JUL 9 2004

SOUTHEAST TELEPHONE, INC.
Complainant

PUBLIC SERVICE
COMMISSION

v.

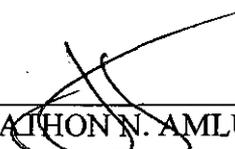
Case No. 2004-00093

KENTUCKY ALLTEL, INC.
Respondent

SOUTHEAST TELEPHONE, INC., RESPONSES TO
COMMISSION STAFF DATA REQUESTS

Comes now SouthEast Telephone, Inc. ("SouthEast"), by and through
counsel, and hereby submits its response to the Commission Staff data requests
propounded on June 22, 2004. The responses are attached hereto are confidential in
nature.

Respectfully submitted,



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COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
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In the Matter of:)
SOUTHEAST TELEPHONE COMPANY)
COMPLAINANT)

v.)

Docket No. 2004-00093

SouthEast Telephone Company)
DEFENDANT)

PETITION FOR CONFIDENTIAL TREATMENT

SouthEast Telephone Company ("SouthEast") moves the Public Service Commission of Kentucky ("Commission") pursuant to K.R.S. §61.878(1)(c)(1) and 807 KAR 5:001, Section 7 to accord confidential treatment to SouthEast's Responses to the First Data Request of Commission Staff issued on June 22, 2004, and in support thereof states the following:

1. On June 22, 2004, Commission Staff issued data requests to SouthEast requesting detailed information regarding all local service requests ("LSRs") submitted by SouthEast Telephone to Kentucky ALLTEL.

2. The LSRs contain customer proprietary information, which is treated as highly confidential by SouthEast. The customer information and LSRs (collectively, "Confidential Information") has not been released publicly and is disclosed internally within SouthEast on a need-to-know basis only and to the Commission only when required and only pursuant to a confidentiality agreement or enforceable order according the Confidential Information confidential treatment. SouthEast employs all reasonable measures to protect te confidentiality of the Confidential Information and to guard against its inadvertent, unauthorized disclosure. Further, SouthEast is not

entitled to publish such Confidential Information on behalf of the customers.

4. K.R.S. §61.878(1)(c)(1) provides in pertinent part:

The following public records are excluded from the application of . . . [the Open Records Act] and shall be subject to inspection only upon order of a court of competent jurisdiction . . .

(c)1. . . records confidentially disclosed to an agency or required by an agency to disclosed to it, generally recognized as confidential or proprietary, which if openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records.

5. Public disclosure of the information would provide other entities an unfair competitive advantage by affording them access to the customers' Confidential Information. Such Confidential Information is generally considered confidential and proprietary in the telecommunications industry.

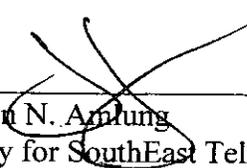
6. The Confidential Information is also protected from disclosure pursuant to K.R.S. §61.878(1)(c)(2)(c) as confidential and proprietary records disclosed to the Commission in conjunction with the regulation of a commercial enterprise.

7. Filed with this Petition are an original and three copies of the Confidential Information in response to Staff's data requests. The information contained in the responses is confidential in its entirety and should be treated as such.

WHEREFORE, SouthEast respectfully requests that the LSRs containing the customer Confidential Information be accorded confidential treatment and be placed in the confidential files of the Commission and that SouthEast be accorded all other relief to which it may be entitled.

Respectfully submitted,

SOUTHEAST TELEPHONE COMPANY,
INC.



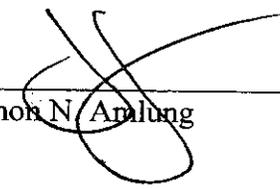
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Petition for Confidential Treatment were served on the following by first class mail, postage prepaid this the 9th day of July, 2004.:

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